UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Adv. Pro. No. 08-01789 (SMB)

Plaintiff-Applicant,

SIPA LIQUIDATION

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

(Substantively Consolidated)

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

GEORGE D. LEVY TRUST; ESTATE OF GEORGE D. LEVY; KAREN S. LEVY, in her individual capacity and in her capacity as Personal Representative of the Estate of George D. Levy; GEORGE D. LEVY & KAREN S. LEVY IRREVOCABLE FAMILY TRUST U/D/T DATED 8/17/90; and DAVID ANDELMAN, in his capacity as Trustee for the George D. Levy and Karen S. Levy Irrevocable Family Trust U/D/T dated 8/17/90,

Defendants.

Adv. Pro. No. 10-04721 (SMB)

STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION

This Stipulation Extending Time to Conclude Mediation ("Stipulation") is submitted pursuant to the Bankruptcy Court's Order entered November 10, 2010 (1) Establishing Litigation

Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order ("Case Management Procedures Order").

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including December 31, 2014.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

[THIS PORTION IS INTENTIONALLY LEFT BLANK]

Dated: December 11, 2014 New York, New York

By: <u>/s/Nicholas J. Cremona</u>

BAKER & HOSTETLER LLP

45 Rockefeller Plaza

New York, New York 10111 Telephone: (212) 589-4200 Facsimile: (212) 589-4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Nicholas J. Cremona

Email: ncremona@bakerlaw.com

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and

Bernard L. Madoff

Dated: December 11, 2014 New York, New York

By: <u>/s/ LaShann M. DeArcy</u>

MORRISON & FOERSTER LLP

1290 Avenue of the Americas New York, New York 10104 Telephone: (212) 468-8042 Facsimile: (212) 468-7900

Gary S. Lee

Email: glee@mofo.com LaShann M. DeArcy Email: ldearcy@mofo.com

Kiersten A. Fletcher

Email: KFletcher@mofo.com

Attorneys for Defendants George D. Levy Trust, Estate of George D. Levy, Karen S. Levy, George D. Levy & Karen S. Levy Irrevocable Family Trust U/T/D Dated 8/17/90, and David Andelman

/s/ Jeffrey N. Rich

RICH MICHAELSON MAGLIFF MOSER, LLP

340 Madison Avenue, 19th Floor New York, New York 10173 Telephone: (212) 220-9403 Facsimile: (212) 913-9641

Jeffrey N. Rich, Esq.

Email: jrich@r3mlaw.com

Mediator